

Reed Kathrein (SB #139304)  
HAGENS BERMAN SOBOL SHAPIRO LLP  
715 Hearst Avenue, Suite 202  
Berkeley, California 94710  
Telephone: (510) 725-3000  
Facsimile: (510) 725-3001  
reed@hbsslaw.com

Steve W. Berman  
Thomas E. Loeser (SB #202724)  
HAGENS BERMAN SOBOL SHAPIRO LLP  
1301 Fifth Avenue, Suite 2900  
Seattle, WA 98101  
Telephone: (206) 623-7292  
Facsimile: (206) 623-0594  
steve@hbsslaw.com  
toml@hbsslaw.com

Peter B. Fredman (SB #189097)  
LAW OFFICE OF PETER FREDMAN  
125 University Avenue, Suite 102  
Berkeley, CA 94710  
Telephone: (510) 868-2626  
Facsimile: (510) 868-2627  
peter@peterfredman.com

Attorneys for Plaintiff HUGO ZALDANA,  
individually, and on behalf of all others similarly situated

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

HUGO ZALDANA, individually, and on behalf )  
of all others similarly situated, )

Plaintiff, )

v. )

KB HOME, a Delaware corporation; )  
COUNTRYWIDE FINANCIAL )  
CORPORATION, a Delaware corporation; )  
COUNTRYWIDE HOME LOANS, a Delaware )  
corporation; COUNTRYWIDE MORTGAGE )  
VENTURES, L.L.C.; and )  
COUNTRYWIDE KB HOME LOANS, an )  
unincorporated association of unknown form, )

Defendants. )

No. 08-cv-3399 MMC

**STIPULATION AND ~~(PROPOSED)~~  
ORDER RE EXPUNGMENT OF  
SENSITIVE PERSONAL  
INFORMATION FROM ECF/PACER  
PUBLIC RECORDS**

1 WHEREAS, Plaintiff inadvertently failed to redact sensitive information from an exhibit to  
2 his Second Amended Complaint (SAC) that could result in identity theft;

3 WHEREAS, said information is located at page 1 of Exhibit E to the SAC, identified in  
4 ECF/PACER as Case 3:08-cv-03399-MMC Document 42-2 Filed 03/13/2009 Page 10 of 18;

5 WHEREFORE, the parties hereby stipulate and agree that said information should be  
6 expunged from the public record in this action.

7  
8 **IT IS SO STIPULATED**

9 DATED: July 27, 2009

HAGENS BERMAN SOBOL SHAPIRO LLP  
LAW OFFICE OF PETER B. FREDMAN

12 By: /S/ Peter Fredman  
Peter B. Fredman  
Attorneys for Plaintiff HUGO ZALDANA

13 DATED: July 27, 2009

14 BRYAN CAVE LLP

16 By: /S/ Brian J. Recor  
Robert E. Boone III  
Jennifer A. Jackson  
Brian J. Recor  
Attorneys for Defendants COUNTRYWIDE  
FINANCIAL CORPORATION et al

19 DATED: July 27, 2009

20 K & L GATES LLP

22 By: /S/ Matthew G. Ball  
Matthew G. Ball  
Attorneys for Defendant KB HOME

25 ECF CERTIFICATION: I, Peter Fredman, the filer of this ECF Document, hereby certify  
26 that the concurrence to this stipulation has been obtained by the above ECF registrants on behalf of  
27 their respective clients in this case. /s/ Peter Fredman  
28

**ORDER**

Pursuant to the stipulation of the parties, and good cause appearing therefore, the Court orders that the Exhibits to plaintiff's Second Amended Complaint, filed March 13, 2009 ~~order that the sensitive information located at page 1 of Exhibit E to the SAC, identified in~~ (docket number 42-1) ~~ECF/PACER as Case 3:08-cv-03399-MMC Document 42-2 Filed 03/13/2009 Page 10 of 18,~~ shall be expunged from the public record in this action. Plaintiff, no later than August 7, 2009, shall file a redacted version of such Exhibits, redacting all sensitive personal information.

**IT IS SO ORDERED**

Dated: July 29, 2009



Hon. Maxine M. Chesney

United States District Court Judge